

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF COLUMBIA**

DENICE MORGAN

Plaintiff

v.

Civil Action No.: 05-0967 (RMC)

MICHAEL L. DOMINGUEZ,  
Secretary of the Air Force

Defendant.

**PLAINTIFF'S CONSENT MOTION FOR ENLARGEMENT OF TIME**

Plaintiff, Denice Morgan, by and through undersigned counsel, respectfully moves this Court pursuant to Rule 6(b)(1), Fed. R. Civ. P., to enlarge the time to reply or otherwise respond to Defendant's Motion to Dismiss, or, in the Alternative, for Summary Judgment. Plaintiff requests that the deadline for responding be extended 30 days, specifically from September 28 to October 28, 2005. This is Plaintiff's first request for an enlargement of time in this case, and no scheduling order has been entered. Defendant, through counsel, graciously consented to this motion.

This enlargement of time is sought because additional time is needed for counsel for the Plaintiff to discuss key issues of the case with Plaintiff and Co-Counsel.

This extension is sought in good faith and will not unfairly prejudice any party. Allowing Plaintiff some additional time to formulate its response will aid both the parties and the Court in the development and resolution of this case.

WHEREFORE, based on the foregoing, Plaintiff respectfully requests that the time for answering or otherwise responding to Defendant's Motion to Dismiss, or, in the Alternative, for Summary Judgment be extended to October 28, 2005.

Dated: September 23, 2005

Respectfully submitted,

DENICE MORGAN  
By Counsel

/S/  
Harvey J. Volzer, DCB 263525  
216 South Patrick Street  
Alexandria, VA 22314  
(703) 549-0446  
(703) 549-0449 facsimile  
Counsel for Plaintiff

/S/  
Fred Goldberg, DCB 279893  
7101 Wisconsin Avenue, Suite 1201  
Bethesda, MD 20814  
(301) 654-3300  
(301) 654-1109  
Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I certify that the foregoing Consent Motion for Enlargement of Time was served upon defendant pursuant to the Court's electronic filing system, addressed to:

Megan Rose  
Assistant United States Attorney  
Judiciary Center Building, E-4220  
Civil Division  
555 4<sup>th</sup> Street, NW  
Washington, DC 20530

on this 23<sup>rd</sup> day of September, 2005.

/S/  
Harvey J. Volzer